

RICHARD G. CAMPBELL, JR.  
Nevada Bar No. 1832  
KAEMPFER CROWELL  
50 West Liberty Street, Suite 700  
Reno, Nevada 89501  
Telephone: (775) 852-3900  
Fax: (775) 327-2011  
Email: rcampbell@kcnvlaw.com

BRENDAN R. TUPA(*Pro Hac Vice*)  
Minnesota Bar No. 0340510  
MESSERLI & KRAMER, P.A.  
Nevada Bar No *Pro Hac Vice*  
1400 Fifth Street Towers  
100 South Fifth Street  
Minneapolis, MN 55402  
(612)672-3600 Telephone  
(612)672-3777  
btupa@kmesserlikramer.com

*Attorneys for Defendant/Counterclaimant*  
*SNAPS Holding Company*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THOMAS K. KURIAN, individually,	)	CASE NO.: 2:19-cv-01757-GMN-EJY
	)	
Plaintiff/Counterdefendant,	)	
	)	
vs.	)	
	)	
SNAPS HOLDING COMPANY, a North	)	
Dakota Domestic Corporation,	)	
	)	
Defendant/Counterclaimant.	)	
	)	

**UNOPPOSED MOTION/STIPULATION TO EXTEND DISCOVERY DEADLINE**  
**AND DEADLINE TO FILE JOINT PRETRIAL ORDER**  
**[First Request to Extend Discovery Deadline;**  
**Fourth Request to Extend Deadline to File Joint Pretrial Order]**

Pursuant to LR IA 6-1(a), Defendant and Counterclaimant SNAPS Holding

1 Company (“SNAPS”) respectfully submits this Memorandum of Points and Authorities  
 2 in Support of its Unopposed Motion/Stipulation to Extend Discovery Deadline and  
 3 Deadline to File Joint Pretrial Order. SNAPS’ counsel has conferred with Mr. Kurian’s  
 4 counsel, and Mr. Kurian’s counsel has no objection to this motion.  
 5

### 6 **POINTS AND AUTHORITIES**

7 In the Court’s Order of June 21, 2023, it reopened discovery for 60 days to allow, among  
 8 other things, SNAPS to depose PTC-220, LLC and redepose Mr. Kurian. (*See* ECF 102). The  
 9 discovery period ends on August 21, 2023.  
 10

11 Since the Court’s Order, the parties have deposed PTC-220, LLC and were coordinating  
 12 the deposition of Mr. Kurian. Unfortunately, SNAPS’ counsel, Mr. Tupa, recently suffered a  
 13 serious, unforeseen medical issue. Mr. Tupa requires additional time to recover, and the parties  
 14 are unable to complete discovery by August 21, 2023. SNAPS has conferred with Mr. Kurian’s  
 15 counsel, and the parties agree that a 60-day extension of the discovery deadline will allow Mr.  
 16 Tupa time to recover and continue forward with this matter. SNAPS, therefore, respectfully  
 17 requests that the Court extend the discovery deadline from August 21, 2023 to October 20, 2023.  
 18

19 Additionally, because the parties’ Joint Pretrial Order is due 30 days from the end of  
 20 discovery (currently set for September 21, 2023), SNAPS respectfully requests that the  
 21 Court extend the Joint Pretrial Order deadline to November 20, 2023.

22 Respectfully submitted,

23  
 24 MESSERLI & KRAMER, PA

25 Dated: August 14, 2023

26 By: s/ Brendan R. Tupa  
 27 BRENDAN R. TUPA, ESQ.  
 28 Nevada Bar No *Pro Hac Vice*  
 1400 Fifth Street Towers

100 South Fifth Street  
Minneapolis, MN 55402  
(612) 672-3600 Telephone  
btupa@kmesserlikramer.com

KAEMPFER CROWELL

RICHARD G. CAMPBELL, JR., ESQ.  
Nevada Bar No. 001832  
50 W. Liberty St., Suite 700  
Reno, NV 89501  
(775)852-3900 Telephone  
Rcampbell@kcnvlaw.com

*Attorneys for Defendant/  
Counterclaimant SNAPS Holding  
Company*

E BRENT BRYSON, LTD.

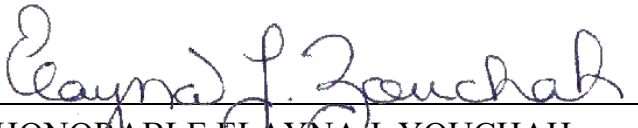
Dated: August 14, 2023

By: s/ E. Brent Bryson  
E. BRENT BRYSON, ESQ.  
Nevada Bar No. 004933  
375 E. Warm Springs Rd, Suite 104  
Las Vegas, NV 89119  
(702) 364-1234 Telephone  
ebbesqltd@yahoo.com

*Attorneys for Plaintiff/  
Counterdefendant Thomas K. Kurian*

**ORDER**

IT IS SO ORDERED.

  
HONORABLE ELAYNA J. YOUCHAH  
UNITED STATES MAGISTRATE JUDGE

DATED: August 14, 2023